Statement of Case

Project: Racecourse Plantations, Plumstead Road East, Norwich
On behalf of: SCC Norwich LLP and the Thorpe and Felthorpe Trust
Date: October 2017
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A. SUMMARY

1. Racecourse Plantations is in a suitable and sustainable location for new housing development. The site is within the Old Catton, Sprowston, Rackheath & Thorpe St Andrew Growth Triangle, one of the areas allocated for growth in the Norwich Policy Area identified in Policy 9 of the Greater Norwich Joint Core Strategy.

2. The vision for the site is to create a beautiful residential development of 300 new homes (including 99 affordable) within a woodland setting, supporting a significant enhancement of the green infrastructure in this key location in the Growth Triangle, contributing to the multi-functional network of green spaces and green links connecting to Norwich and the rural hinterland as envisaged in the Growth Triangle Area Action Plan.

3. The site is adjacent to a number of sites allocated for housing in the Growth Triangle and will contribute to the provision of the 7,000 dwellings proposed by 2026 rising to 10,000 new dwellings eventually allocated for this area in the Joint Core Strategy Policy 9.

4. As well as providing much needed new homes including affordable homes, the proposal provides additional open space for public benefit, in the form of a c.63 hectare Community Woodland Park, as supported by Policy GT2 (Green Infrastructure) in the Growth Triangle Area Action Plan. This Community Woodland Park will provide for ecological conservation and enhancement as well as educational and recreational use by the local community.

5. Policy GC1 of the Development Management Development Plan Document (DMDPD), writes into the Development Plan the presumption in favour of sustainable development set out in paragraph 14 of the National Planning Policy Framework (“the Framework”). This policy states that:

   “Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

   i. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

   ii. Specific policies in that Framework indicate that development should be restricted.”

6. The presumption in policy GC1 (& paragraph 14 of the NPPF) applies in this case as it is a matter of common ground that the Council cannot demonstrate a five year supply of housing land; accordingly the development plan’s housing land supply policies are out of date. Applying the presumption to the case, there are no specific policies in the Framework that indicate that the development should be restricted and the (limited if any) adverse impacts of allowing the appeal would not significantly and demonstrably outweigh the benefits of doing so. In these circumstances, applying section 38(6) of the
Planning & Compulsory Purchase Act 2004 it would be in accordance with the development plan to allow the appeal; material considerations do not indicate otherwise but rather add weight to the case for granting planning permission.

7. The development proposals recognise the ecological considerations of the appeal site and its surroundings but importantly will deliver an overall enhancement to habitats within the appeal site as well as benefits to protected / notable species utilising the area. Further benefits will also be delivered in the wider landscape through the securing of green corridors. The primary enhancement will be achieved through the fundamental change from commercial forestry management, which is not currently sympathetic to the site’s existing biodiversity value, to one with a specific ecological focus. This shift to ecologically driven management would enable the site’s ecological potential to be realised, whilst enhancing the overall sustainability of the site and surrounding locality in ecological terms.

8. The proposals will assimilate well into the local landscape character and in overall terms there would be a beneficial landscape effect.

9. There will be a s106 planning obligation to provide 33% affordable housing consistent with policy and a range of highways and open space contributions, as well as the provision of the Community Woodland Park. These are outlined in Appendix 01.
B. INTRODUCTION

10. SCC Norwich LLP and the Thorpe and Felthorpe Trust ("the appellants") made an application on 1 November 2016 for the erection of up to 300 new homes and the creation of a new Community Woodland Park at Racecourse Plantations, Plumstead Road East, Norwich. The planning application is with all matters reserved with the exception of access.

11. A location plan of the site appears at Appendix 02 with a wider aerial plan at Appendix 03 showing how the site sits within the Old Catton, Sprowston, Rackheath & Thorpe St Andrew Growth Triangle. The illustrative masterplan is attached as Appendix 04.

12. The local planning authority is Broadland District Council ("the Council").

13. Dominic Lawson Bespoke Planning Ltd is the town planning consultant to the appellant. The outline planning application was validated by the Council on 1 November 2016. The application reference is 20161896.

14. The decision notice to refuse the application using delegated powers was issued on 14 June 2017 (attached as Appendix 05).

15. This appeal has been submitted against refusal of the application.

16. To support the appeal, the appellants will provide expert evidence in relation to:
   i. Ecology;
   ii. Landscape and visual;
   iii. Housing need and supply; and
   iv. Planning.

17. Matters of drainage and highways have been agreed and will form part of the Statement of Common Ground.
C. THE PROPOSAL

18. The proposal is for the creation of a small new community within Broadlands, relating to the new developments which are already allocated in the Growth Triangle.

19. Racecourse Plantations is located to the east of Norwich, along Plumstead Road which connects Norwich City Centre with Thorpe St Andrew and Thorpe End. The site comprises Racecourse, Belmore, and Brown’s Plantations.

20. The site was originally contiguous with Mousehold Heath, which was once a much larger area surrounding the site, now largely built upon or converted to farmland.

21. The site is currently in use as a commercial forestry plantation, with forestry operations (a mixture of clear felling, selective felling and coppicing) taking place annually with a licence to continue these operations until August 2023.

22. There are also paintball and archery businesses on the site. These uses are accommodated within the central and eastern part of Racecourse Plantation, with boundaries delineated by fencing / screening fixed to the trees, with associated paraphernalia (obstacles, targets etc) scattered around.

23. Part of Racecourse Plantation was designated a County Wildlife Site (Ref.2041) in 1997, as well as Belmore and Brown’s Plantation (Ref. 2042). The survey was updated in 2011 for Racecourse Plantation only.

24. To the south side of Plumstead Road, within the northern section of Belmore Plantation, is a well-used but informal footpath known locally as the ‘Trod’. This narrow and uneven path provides informal pedestrian and cycle access along Plumstead Road, including connections to Pound Lane which in turn leads southwards towards Thorpe St Andrew High School and the Oasis Sports and Leisure Club.

25. The site is mostly surrounded by existing development, and further development is proposed on sites to the north and east of Racecourse Plantations.

26. The vision for the proposal is to create a beautiful residential development within a woodland setting, supporting a significant enhancement of the green infrastructure in this key location in the Growth Triangle, contributing to the multi-functional network of green spaces and green links connecting to Norwich and the rural hinterland as envisaged in the Growth Triangle Area Action Plan.
D. PLANNING HISTORY

27. The site has not been the subject of any previous planning applications.
28. However, the site is the subject of a Forestry Commission Licence.

Forestry

29. Racecourse Plantations is made up of three forestry plantations: Racecourse, Belmore and Brown’s. It is known locally as Thorpe Woodlands.
30. All three plantations benefit from a Forestry Commission Licence (contract number 32176) to fell growing trees up to 7 August 2023. Much of the area will be clear felled or selectively felled given the age of the existing trees. Another Forestry Commission Licence will be applied for in 2022 to start on 8 August 2023 for a further ten years.
31. By 2023, much of the surrounding area will have been developed for residential accommodation, leaving Racecourse Plantations as an anomalous private forestry business within an otherwise carefully planned residential extension to Norwich.
32. Despite the Council’s desire for there to be public access to Racecourse Plantations to assist in the development of the “Green Infrastructure” of the area, there is currently no public right of access to these sites. Public access would be secured for the long-term benefit of the local community through allowing this appeal.
E. **PLANNING POLICY BACKGROUND**

33. Section 38(6) of the Planning and Compulsory Purchase Act (2004) sets out the basic principle which must be followed in the determination of all applications for planning permission, including appeals, stating:

“If regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise.”

34. The above principle is also referenced within the National Planning Policy Framework (“the Framework”) at paragraph 11 which states:

“Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.”

**National Policy**

35. The National Planning Policy Framework (“the Framework”, 2012) and Planning Practice Guidance (“PPG”, 2016) are material considerations of significant weight when determining planning applications. The following paragraphs of the Framework are of specific relevance to this appeal:

i. Paragraph 7: Sustainable development;

ii. Paragraph 11: The presumption in favour of sustainable development;

iii. Paragraph 14: The presumption in favour of sustainable development;

iv. Paragraph 17: Core planning principles;

v. Paragraph 29: Promoting sustainable transport;

vi. Paragraph 32: Transport Statement or Transport Assessment;

vii. Paragraph 34: Sustainable transport modes;

viii. Paragraph 47: Delivering a wide choice of high quality homes;

ix. Paragraph 49: Housing applications considered in the context of the presumption in favour of sustainable development;

x. Paragraph 103: Flood risk; and

xi. Paragraph 109 – 125: Conserving and enhancing the natural environment.

36. Section 19(2) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to have regard to national policies and advice.

37. The Framework’s guidance on ecology and biodiversity finds expression in Chapter 11, of the Framework.
**Broadland Development Plan**

38. The statutory Development Plan for the application site comprises:
   i. Broadland, Norwich and South Norfolk Joint Core Strategy (adopted March 2011, amendments adopted January 2014);
   ii. Development Management Plan Document (2016);
   iii. Site Allocations Development Plan Document (2016); and
   iv. Old Catton, Sprowston, Rackheath & Thorpe St Andrew Growth Triangle Area Action Plan (July 2016).

39. The development plan policies relevant to this appeal are:
   The Joint Core Strategy for Broadland, Norwich and South Norfolk (adopted 2011, amended 2014)
   i. Policy 1: Addressing climate change and protecting environmental assets;
   ii. Policy 3: Energy and water;
   iii. Policy 4: Housing delivery;
   iv. Policy 7: Supporting communities;
   v. Policy 8: Culture, leisure and entertainment;
   vi. Policy 9: Strategy for growth in the Norwich Policy Area; and

   i. Policy GC1: Presumption in favour of sustainable development;
   ii. Policy GC2: Location of new development;
   iii. Policy GC4: Design;
   iv. Policy EN1: Biodiversity and Habitats;
   v. Policy EN2: Landscape;
   vi. Policy EN3: Green Infrastructure;
   vii. Policy RL1: Provision of formal recreational space;
   viii. Policy TS3: Highway safety; and
   ix. Policy CSU5: Surface water drainage.

   The Old Catton, Rackheath, Sprowston & Thorpe St Andrew Growth Triangle Area Action Plan (2016)
   i. Policy GT2: Green Infrastructure; and
   ii. Policy GT3: Transport.
**F. FIVE YEAR HOUSING LAND SUPPLY**

40. It is common ground that the Council does not have a five year housing land supply.

41. Following an appeal for the refusal of 75 dwellings at Carshalton Road, Norwich, in March 2013 (appeal ref: APP/G2625/A/13/2195084) it is noted that for development management purposes the Local Planning Authorities should treat the whole Norwich Policy Area (NPA) as the relevant area for calculating and assessing the housing land supply position for sites that fall within it. The appeal site is entirely within the NPA.

42. According to the Joint Core Strategy, the total housing requirement for the NPA is 1,825 per annum.

43. Based on this figure, the latest AMR for 2015/16 notes a land supply of only 4.7 years. This figure has been calculated using a 20% buffer, given the persistent under-supply, as per paragraph 47 of the Framework, and the Liverpool methodology for dealing with accumulated undersupply which allows the back-log to be spread over the whole plan period (to 2026) rather than in the five year period.

44. Reviewing the data from the Annual Monitoring Reports from 2010/11 onwards, there has been a persistent and significant under-supply of housing supply against the requirement in each year for which completion data is available (up until 2015/16).

45. Furthermore, delivery against projected supply also demonstrates under-performance, with actual delivery being significantly under projected delivery in four of the past five years for which information is available. Accordingly the 4.7 years supply is based on very optimistic projections.

46. It is also noted that actual completions have never achieved the annualised requirement of 1,825, with the largest number of completions in any one year being 1,164 in 2015/16.

47. In this context, the appellants will argue that the shortfall since 2008 should be dealt with using the Sedgefield method, given the requirement of paragraph 47 of the Framework to boost significantly the supply of housing, especially as there is no evidence that there is an assumption of growing supply towards the end of the plan period, which would be reflected in a stepped requirement which increases towards 2026.

48. To continue using the Liverpool methodology simply postpones indefinitely the delivery of the shortfall.

49. Applying the Sedgefield approach, the appellants will argue that housing land supply for the NPA is overstated, and is closer to 3.7 years.

50. On either basis, the appellants will demonstrate that the provision of up to 300 new homes at Racecourse Plantations will provide an essential boost to the housing supply in the NPA, contributing towards the achievement of the five year housing land supply, providing much needed new homes, including the provision of 99 affordable homes.
51. The appellants will also demonstrate that the provision of 99 new affordable homes in an area of affordable housing need and an ever increasing backlog in delivery should be afforded substantial weight in the determination of this appeal, regardless of the five year housing supply situation.
G. THE APPELLANTS’ CASE

Introduction

52. The proposal is for outline planning permission for “the erection of up to 300 new homes and the creation of a new Community Woodland Park” at Racecourse Plantations, Plumstead Road East, Norwich. The planning application is with all matters reserved with the exception of access.

53. The reasons for refusal of the application are summarised below for ease of reference (see Appendix 05 for the decision notice).

54. The Decision Notice says that the proposal is contrary to the following policies:
   i. the Local Plan taken as a whole, as the proposal lies outside the settlement limit and is not allocated for any development. The application is contrary to the Local Plan;
   ii. sustainable development - paragraphs 7, 17 and 109, of the National Planning Policy Framework (NPPF);
   iii. Policy 1 of the Joint Core Strategy and Policy EN1 of the Development Management Development Plan Document (DMDPD);

55. The notice states that there is an absence of a five year housing land supply in the Norwich Policy Area but claims that the acknowledged benefits of the 300 proposed homes are significantly and demonstrably outweighed by the adverse impacts of the proposed development.

56. Based on the decision notice, the issues relevant to the consideration of this appeal are set out below.

Ecology

57. The Council refused the application (in part) on the basis of a number of ecological reasons. These reasons are generally consistent with those raised by statutory consultees including Natural England (NE), Norfolk County Council (NCC) and the non-statutory consultee Norfolk Wildlife Trust (NWT). In light of the ecological enhancement delivered by the development proposals, the Appellant considers that all of the reasons from the Council and Consultees are unwarranted or unfounded.

58. The appeal proposals aim to deliver a high-quality, residential scheme which recognises through its scale, design and location, the important ecological considerations. In addition, the proposals provide for long-term recreational and ecological benefits. This includes a fundamental change from commercial forestry management, which is not sensitive to the site’s potential biodiversity value, to one with a specific ecological focus where nature conservation is paramount. In doing so, the proposal seeks to enhance the County Wildlife Site and green infrastructure links in the wider area to achieve long-term management and enhancement of the local biodiversity.
59. The Appellants consider that the appeal proposals have been carefully designed, and consideration of the appeal site’s ecological sensitivities has been a key objective throughout the development of the proposal.

60. Significant ecological benefits are proposed to be delivered through the development, including:

   i. The retention of a woodland landscape type across Racecourse Plantation with existing ecological connectivity maintained from north to south and east to west across the woodland.

   ii. The creation of a more biodiverse and ecologically valuable habitat mix across the site, including the creation of substantial areas of new open heathland habitat that would be managed in perpetuity to meet agreed ecological and biodiversity objectives.

   iii. The potential future extension of the County Wildlife Site boundary in Brown's Plantation to incorporate an area of proposed heathland creation that is currently coniferous plantation of limited ecological value.

   iv. Pond restoration and management for the benefit of great crested newt and other wetland wildlife.

   v. Improve the prospects for the chaffweed and allseed that are the basis of the County Wildlife Site designation.

   vi. Creation of open habitats and connected rides for the benefit of reptiles and invertebrates.

   vii. Provision of integrated bat and bird boxes into new buildings and on retained trees across the site to enhance bat roosting and bird nesting opportunities, often a limiting factor for these species.

61. The evidence will demonstrate that a fundamental shift from commercial forestry led management to ecologically driven and designed programme would enable the site’s ecological potential to be realised and optimised.

62. Protection of the undeveloped woodland in perpetuity with management control handed to an appropriate management vehicle will more than counter the loss of 8.78 ha of the lower value part of the woodland in order to accommodate the appeal proposals.

63. Evidence will be presented to show how the appeal proposals will contribute to a multifunctional green infrastructure network, in line with Policy GT2 of the Growth Triangle Area Action Plan. Policy GT2 recognises the importance of the site as a hub within this network of routes, including areas of retained woodland and trees, open space, swales, wildlife resources and effective linkages between them including connections to adjoining areas.

64. The appeal proposals seek to retain, wherever possible, all existing high quality ecology features, such as rides and clearings which support dry-heath/acid grassland as well as those that contribute to bat foraging and possible roosting activity, such as veteran trees, tree belts.
65. Evidence will also show that reinforced woodland planting along the boundaries of the site will maintain the ecological connectivity functions of Racecourse Plantation.

66. The appellants’ evidence will show that rather than compromising the County Wildlife Site and its ability to function both ecologically and as a recreational resource, the appeal proposals offer a mechanism to achieve the objectives and aspirations of both local and national policy. Fundamental to achieving this has been the baseline assessments, the appeal site having been subject to a suite of ecological survey and assessment work.

67. Evidence will show how the appeal proposals have been designed in careful consideration of the findings of the survey and assessment work to ensure significant adverse impacts are avoided on ecologically valuable habitats and protected species.

68. The Appellant will show that the appeal proposals will enhance and protect the long-term future ecological value of the appeal site as well as providing important multi-functional green infrastructure and public open space as the surrounding development sites are built out.

69. In terms of protected species, there is no evidence presented by either the LPA or consultees that the appeal proposals would lead to harm, or limit the ability of any protected or notable species to be retained as part of the appeal proposals. The appellants will demonstrate that contrary to the concerns expressed the measures proposed as an integral part of the appeal proposals will secure the long-term enhancement of habitats and in turn the species which rely upon them.

70. The evidence will demonstrate that the appeal proposals will not contravene the tests set out within the Conservation of Habitats and Species Regulations 2010 (as amended) and the proposals would not give rise to any adverse impact in relation to the Norfolk Broads. Indeed, the proposal would reduce recreational pressure on the Broads by offering a more local alternative for recreation, in accordance with Objective 7 of the Growth Triangle Area Action Plan.

71. The proposal is sustainable in term of ecology. The appeal scheme has identified and assessed the ecological resource, such that the appeal proposals have been designed and located in full consideration of the ecological baseline. The appeal proposals provide a fundamental change from commercial forestry management, which is not currently sympathetic to the site’s existing biodiversity value, to one with a specific ecological focus. In securing the enhancement of the appeal site the proposals will also secure the green infrastructure network to the County Wildlife Site and wider areas. This shift to long-term ecologically driven management will enable the site’s ecological potential to be realised, whilst enhancing the overall sustainability of the site and surrounding locality. As such the evidence will show that the appeal proposals are in line with both local and national policy and that there are no justifiable ecological reasons for dismissing the appeal.

**Landscape**
72. At a District level the site is located within Landscape Character Type (LCT) E: Wooded Estatelands, and specifically within Landscape Character Area (LCA) E3: Spixworth Wooded Estatelands, as set out in the BDC Landscape Character Assessment, adopted in 2013. This LCA forms a narrow band of land to the north and eastern edge of Norwich, typically between 2km to 4km in depth, and contains arable cultivation and urban fringe land uses. It generally has a semi-rural character, which has been diluted by infrastructure and hedgerow loss. Robust blocks of woodland contain views in this flat landscape.

73. The Growth Triangle AAP identifies the following landscape related policies as set out in policy GT 2:
   i. A Landscape Setting designation envelopes Thorpe End, which is located to the west of (beyond) the appeal scheme and is therefore not applicable to the appeal scheme;
   ii. Establishes Two Primary and seven Secondary Green Infrastructure Corridors (see map at Appendix 06). One of the Primary GI Corridors (Thorpe Ridge) and three of the Secondary GI Corridors relate to the appeal site (Thorpe Woodlands to Dobbs Beck – via Harrisons Plantation, Thorpe Woodlands to Dobbs Beck – via Rackheath Park, and Thorpe Woodlands to Witton Run) and are therefore applicable to the appeal scheme;
   iii. Three Open Space Assets are identified that will make an important contribution to the Green Infrastructure Network; none of these assets relate to the appeal site and are not applicable;
   iv. The provision of informal and formal open space will be delivered through development in accordance with Development Management Policies, supporting the delivery of the GI Corridors. This approach is applicable to the development proposed within the appeal scheme, and;
   i. Beyond development or open space allocation/designation, Green Infrastructure proposals will be permitted provided there is no significant harm in terms of biodiversity, landscape or other material considerations. This approach also relates to the appeal scheme.

74. The application site is not a valued landscape, as protected by paragraph 109 of the NPPF. It has no special or demonstrable physical attributes, does not form part of a landscape designation, and has no public rights of access.

75. A detailed Landscape Strategy (see Appendix 07) was submitted with the application, setting out how the overarching landscape objectives will be achieved.

76. The key actions identified in this Strategy are:
   i. Establish and manage informal/natural green space throughout the development site and the Community Woodland Park to provide attractive spaces and setting for circulation and enjoyment of the
woodland, enhance biodiversity and assist in sustainable drainage systems;
ii. Establish and manage recreation and play facilities within the green corridors, crescent green space and lanes;
iii. Provide a clear definition to public and private spaces and ownership, whilst maintaining the character of the plantation, and;
iv. Retain, establish, improve and maintain key movement routes for residents and the wider public in a convenient and safe manner that is appropriate to the routes’ function and character.

77. In respect of Landscape and Visual Impact Assessment, the appeal scheme has been independently assessed with the following concluding effects after 15 years establishment:
   i. In respect of Landscape Character, the effect is slight to negligible and neutral, with a positive effect being likely after 15 years woodland management.
   ii. In respect of Landscape Resource, the effect is moderate beneficial.
   iii. In respect of Visual Amenity, the proposed change is very highly contained, and residual visual effects are therefore negligible to slight adverse.

78. As a result of the above, and in the context of adopted planning policy GT2, the proposed development:
   i. Delivers the single Primary GI Corridor and three Secondary GI Corridors as envisaged within Policy GT 2 of the Growth Triangle AAP;
   ii. Provides informal and formal open space alongside development in accordance with Development Management Policies, whilst supporting the delivery of the GI Corridors, and;
   iii. Has an overall positive effect on its landscape baseline (character, resource and visual) and would not have significant long-term landscape or visual adverse effects on the local landscape.

79. The appeal scheme therefore complies with the landscape related considerations of the Growth Triangle AAP Policy GT 2.

Housing

80. The proposal would provide up to 300 new homes, including much-needed affordable housing. This housing would be a mix of 1, 2, 3 and 4 bedroom properties in accordance with the most recent housing mix requirements (set out in figure 95 of the Central Norfolk Strategic Housing Market Assessment, January 2016). 33% of the homes will be affordable (85% social-rented and 15% intermediate tenure), in line with Policy 4 of the Broadland, Norwich and South Norfolk Joint Core Strategy.
81. The Broadland, Norwich and South Norfolk Joint Core Strategy sets out to deliver 37,000 new homes between 2008-2026.
82. 11,099 of these new homes are to be provided within Broadland (within the Norwich Policy Area), with 7,000 of these within the Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle in the plan period, rising to 10,000 after 2026 (Policy 9 of the JCS).
83. The Council cannot currently demonstrate a five year housing land supply. Consequently, the proposal must be considered in the context of the presumption in favour of sustainable development as set out in policy GC1 of the DM DPD and paragraph 14 of the Framework.

**Flood Risk and Drainage**

84. Minimising flood risk, mitigating such risk and implementing sustainable drainage measures are key aims of local policy (Policy 1 of the Joint Core Strategy, Policy CSU5 of the Development Management Development Plan Document).
85. The site is wholly located within flood zone one, and is identified as being at 'very low' risk of flooding from surface water. A network of ponds is present on the site, with a pond located on the north western edge of the site along with two small ponds located close to the eastern boundary of the site. There is also a series of ponds located within Belmore Plantation, which are connected to Racecourse Plantation via the ditch network and culvert crossing beneath Plumstead Road East.
86. As set out in the Flood Risk Assessment (Create Consulting Engineers, 2016, paragraph 4.6), surface water flows runoff will be attenuated using SUDS (such as soakaways, porous paving, swales in accordance with Policy 10 of the Joint Core Strategy and Policy CSU5 of the Development Management DPD) such that flows from the site are restricted (with an allowance for an increase in rainfall intensity of 40% due to climate change) prior to a discharge into the ditch system to the south of the site. Mitigation measures are proposed (Table 5.3) to mitigate any remaining risk.

**Transport**

87. Given the trip generations estimated for the Racecourse Plantations site, there is likely to be a small net reduction in traffic on the network overall, with the application development, the NDR, and the Growth Triangle allocated sites in place. The proposal accords with Policy TS3 of the Development Management DPD.
88. The development will comply with Norfolk County Council's Parking Standards to ensure there is adequate on and off-street parking.
89. In addition to the above, the proposal seeks to provide pedestrian and cycle connectivity in accordance with Policy 6 of the Joint Core Strategy, including significant upgrades to existing facilities, to promote sustainable transport opportunities. A key component of this strategy is also to provide links
through the development, to connect the existing residential developments to the allocated sites to the north and east of Racecourse Plantations.

90. A permeable street layout is planned which encourages walking and cycling, both within and beyond the site in accordance with Policy GT3 of the Growth Triangle Area Action Plan. The sustainable transport measures proposed, including the provision and enhancement of pedestrian and cycle routes in to, out of and within the site, are also significant social benefits through promoting more active travel modes and encouraging connectivity within the local area in accordance with Policy GT3 of the Growth Triangle Area Action Plan.

**Conclusion**

91. The proposal would deliver significant social, economic and environmental benefits in accordance with local (Norwich Policy Area and Broadland District) planning policies. As well as the benefits of providing new and much-needed housing, including affordable housing, the proposal would deliver a significant social and environmental benefit through the creation of a Community Woodland Park; a significant green infrastructure resource which would be newly multi-functional, promoting recreation, access and nature conservation through active woodland management, instead of the existing forestry management. The proposal would lead to a net gain in biodiversity.

92. In the absence of a five year supply of housing land the presumption in favour of sustainable development as set out in policy GC1 of the DMDPD (& paragraph 14 of the NPPF) applies.

93. The policy and the Framework refer to whether there are any specific policies in the Framework that indicate development should be restricted. These policies are set out in footnote 9 of the Framework, and include: policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and / or designated as Sites of Special Scientific Interest; land designated as green belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.

94. None of the above designations apply to the site.

95. No adverse impact is considered to arise in relation to the Norfolk Broads. Indeed, the proposal may reduce recreational pressure on the Broads by offering a more local alternative for recreation, in accordance with Objective 7 of the Growth Triangle Area Action Plan.

96. The nearest designated heritage asset is Thorpe End Conservation Area, 250m east of the site. Rackheath Hall and its Historic Parkland / Historic Gardens is located 750m north-east of the site. The proposal is not considered to impact upon these heritage assets.

97. Consequently, there are no specific policies which indicate that development should be restricted.
The adverse impacts (such as they are and if any) of allowing the appeal would not significantly and demonstrably outweigh the (very considerable) benefits of doing so.

98. Given this, and in any event, allowing the appeal would be in accordance with the development plan taken as a whole, and material considerations do not indicate otherwise but rather add weight to the case for granting permission.
H. LIST OF APPENDICES

i. Appendix 01 Draft s106 Heads of Terms
ii. Appendix 02 Site location Plan
iii. Appendix 03 Aerial Plan
iv. Appendix 04 Illustrative Master Plan
v. Appendix 05 Decision Notice
vi. Appendix 06 Green Infrastructure Corridors Map
vii. Appendix 07 Landscape Strategy